Rocky Flats Citizens Advisory Board Recommendation 2000-5

to Kaiser-Hill

Comments on the RFCA Standard Operating Protocol for Facility Disposition

Approved July 6, 2000

July 7, 2000

Jeff Stevens Kaiser-Hill, RFETS Building 771A 10808 Highway 93, Unit B Golden, CO 80403-8200

Dear Mr. Stevens:

The Rocky Flats Citizens Advisory Board (RFCAB) has reviewed the RFCA Standard Operating Protocol (RSOP) for Facility Disposition. In addition, the Board has had the opportunity to review comments of other interested parties. The Board feels the site should implement our recommendations to the final RSOP for Facility Disposition because they represent a broad spectrum of interested groups.

The Rocky Flats Citizens Advisory Board's recommendations for the Final RSOP for Facility Disposition

<u>Page 4, paragraph 5</u>. Facilities may be demolished as a cluster, or one or several facilities may be demolished while the remaining facilities are demolished at a later time.

Recommendation: RFCAB recommends that the RSOP include a more definitive explanation of buildings to be included in this statement and how it would be applied if a cluster included Type 3 facilities.

<u>Page 8, ER Transition, second bullet</u>. This bullet indicates that "whenever possible, the subcontractor with primary responsibility for facility demolition will also conduct ER remediation."

Recommendation: RFCAB recommends that the RSOP address any lapse of time between

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demolition and environmental restoration. This should be done by presenting a plan to stabilize contamination resulting from any demolition activity until environmental restoration activities commence.

<u>Page 17, first paragraph, second sentence</u>. The evaluation for the use of explosive processes should involve regulatory input.

Recommendation: RFCAB recommends that the evaluation of explosive processes involve regulatory, local government and public input before such action is taken.

<u>Page 27, 5.3 Water Quality</u>. Facility demolition activities have a great potential to have adverse impacts on surface water.

Recommendation: RFCAB recommends that the RSOP address the importance of harmful impacts to surface water through the creation of a remedial plan.

<u>Page 29, Section 5.7 Visual Resources, second paragraph</u>. Dust generated during demolition may be temporarily visible but would dissipate before leaving the site as a visible cloud or plume of dust.

Recommendation: RFCAB recommends that every effort be made to ensure that air pollutants are not released to the environment due to demolition, especially not as a visible cloud of dust that would alarm the public.

<u>General comment</u>. The term "unrestricted release" is used in several places with no definition or reference in this RSOP document. The document needs to include this definition and state how it will be determined that the building meets the criteria for unrestricted release.

The Rocky Flats Citizens Advisory Board appreciates the opportunity to review and make recommendations to the Final RSOP for Facility Disposition.

Sincerely,

Dr. Gerald L. DePoorter Chair

The Rocky Flats Citizens Advisory Board is a community advisory group that reviews and provides recommendations on cleanup plans for Rocky Flats, a former nuclear weapons plant outside of Denver, Colorado.

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